NEW MEXICO
ENVIRONMENT DEPARTMENT

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Jennifer J. Pruett
Deputy Secretary

Certified Mail – Return Receipt Requested

September 23, 2019

Ana Padilla, President
Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc.
P.O. Box 6308
Navajo Dam, New Mexico 87419

Re: Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc.; Water Treatment Plant (WTP); Minor Non-Municipal Individual Permit; SIC 4941, NPDES Compliance Evaluation Inspection; NM0030953; September 5, 2019

Dear Ms. Padilla:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Erin Shea t 505-827-0418 or at erin.shea@state.nm.us.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6ECDWM) by e-mail
David Long, USEPA (6ECDWM) by e-mail
Nancy Williams, USEPA (6ECDWA) by e-mail
Amy Andrews, USEPA (6ECDWM) by e-mail
David Esparza, USEPA (6ECDWM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WDPE) by e-mail
Robert Italiano, NMED District II by e-mail
Candice Gehring, Navajo Dam DWC & MSWC, Inc., by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2		3	NPDES								11	12	yr/mo/day						17	18	Inspec. Type	19	Inspector	20	Fac Type
	N		5		N	M	0	0	3	0	9	5	3		1	9	0	9	0	5			C		S		2

Remarks

W	T	P	-	E	M	E	R	G	E	N	C	Y		F	I	L	T	E	R		B	A	C	K	W	A	S	H

Inspection Work Days		Facility Evaluation Rating		BI		QA		Reserved
67	69	70	3	71	N	72	N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc. dba Navajo Dam DWC&MSW, Inc. or Navajo Dam Water Consumers Association, Water Treatment Plant, 4 County Road (CR) 4267 (Hardgrove Drive, Lot 2 & 3), Navajo Dam, NM 87419. San Juan County.

Entry Time /Date: 1120 hours / 09/05/2019

Exit Time/Date: 1350 hours / 09/05/2019

Permit Effective Date: November 1, 2014

Permit Expiration Date: October 31, 2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

-Candice (Cindy) Gehring, Secretary, Navajo Dam DWC&MSW, Inc. / 505-634-8831
-Cindy Huntsman, Water Level 4 Operator, Navajo Dam DWC&MSW, Inc. / 505-632-2104

Name, Address of Responsible Official/Title/Phone and Fax Number

Ana Padilla, Navajo Dam DWC&MSW, Inc., P.O. Box 6308, Navajo Dam, New Mexico 87419 / President / 505-634-0236

Contacted: Yes [ ] No [*]

Other Facility Data

Outfall 001 (Source Google Earth)
Latitude 36.807939°
Longitude -107.696695°

Degree, Minute, Second
36°48'28.58"N, 107°41'48.10"W

SIC 4941

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **SEE ATTACHED CHECKLIST REPORT WITH FURTHER EXPLANATIONS AND PHOTO LOG.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin Shea ***/s/Erin Shea*** ***(f/k/a Erin S. Trujillo)***	**NMED/SWQB/505-827-0418**	**09/13/2019**
Signature of Management QA Reviewer	**Agency/Office/Telephone/Fax**	**Date**
Jennifer Foote ***/s/Jennifer Foote***	**NMED/SWQB/505-827-2795**	**09/13/2019**

Navajo Dam DWC&MSW, Inc. / Navajo Dam WTP / September 5, 2019	PERMIT NO. **NM0030953** **Page 1 of 3**

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐ S ☐ M ☒ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **Renewal application has not been submitted which was due 180 days prior to permit expiration on 10/31/2019.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. **See Further Explanations**	☐ Y ☒ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT.	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED. **No discharge**	☐ Y ☐ N ☒ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **Last inspection occurred on 05/15/2013. Permittee submits DMRs into USEPA electronic NetDMR system. USEPA does not have record of receiving 1st and 2nd Quarter 2016 DMRs.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☐ Y ☐ N ☒ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐ S ☐ M ☐ U ☒ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☐ Y ☐ N ☒ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☐ Y ☐ N ☒ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☐ Y ☐ N ☒ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☐ Y ☐ N ☒ NA
e) DATES AND TIMES OF ANALYSES.	☐ Y ☐ N ☒ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☐ Y ☐ N ☒ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☐ S ☐ M ☐ U ☒ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☐ S ☐ M ☐ U ☒ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☐ N ☒ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **Water level in settling basin was below outlet pipe on day of this inspection.**

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED. **Accumulated solids observed in ponds.**	☐ S ☒ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☐ S ☐ M ☐ U ☒ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **SCADA operational**	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☐ S ☐ M ☐ U ☒ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. **Update may be needed if permit renewed**	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **Update may be needed if permit renewed**	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. **Update may be needed if permit renewed**	☐ Y ☒ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? ☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? ☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? ☐ Y ☐ N ☒ NA

10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? ☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? ☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *).*
DETAILS: **If discharge, Permit requires monitoring for pH, specific conductance, TSS, total Recoverable Aluminum, Hardness, Total Residual Chlorine, and Whole Effluent Toxicity**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. ☐ Y ☐ N ☒ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☐ Y ☐ N ☒ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. ☐ Y ☐ N ☒ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. ☐ Y ☐ N ☒ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. ☐ Y ☐ N ☒ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE ☐ Y ☐ N ☒ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. ☐ Y ☐ N ☒ NA

b) PROPER PRESERVATION TECHNIQUES USED. ☐ Y ☐ N ☒ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. ☐ Y ☐ N ☒ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? ☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *)*
DETAILS**: If discharge would occur, then permit requires 1/day estimate flow measurement subject to accuracy and reliability conditions in Part III.C.6 (flow measurement). No flow measurement device installed.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☐ Y ☐ N ☒ NA
TYPE OF DEVICE _____

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☐ Y ☐ N ☒ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. ☐ Y ☐ N ☒ NA

4. CALIBRATION FREQUENCY ADEQUATE. ☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES. ☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. ☐ Y ☐ N ☒ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. ☐ Y ☐ N ☒ NA

6. HEAD MEASURED AT PROPER LOCATION. ☐ Y ☐ N ☒ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. ☐ Y ☐ N ☒ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *).*
DETAILS: **Permit requires monitoring on-site for pH & TRC, other analysis by contract laboratory). Quality Control procedures would be required if facility decides to continue permit and before discharge.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)* ☐ Y ☐ N ☒ NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☐ U ☒ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☐ U ☒ NA

5. DUPLICATE SAMPLES ARE ANALYZED. ____% OF THE TIME. ☐ Y ☐ N ☒ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☐ Y ☐ N ☒ NA

LAB NAME
LAB ADDRESS
PARAMETERS PERFORMED

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	**No Discharge**	**No discharge**	**No discharge**	**No discharge**	**No discharge**	**No discharge**	**None**

RECEIVING WATER OBSERVATIONS: **Permittee representatives described that there has been no discharge.. See Photo Log**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. **No effluent / No discharge** ☐ S ☐ M ☐ U ☒ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED* ***No*** *).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED: GRAB _____ COMPOSITE SAMPLE _ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Navajo Dam DWC&MSW, Inc. Water Treatment Plant
NPDES Permit No. NM0030953
Compliance Evaluation Inspection
September 5, 2019

Further Explanations

Introduction

On September 5, 2019, Erin Shea, accompanied by Daniel Valenta, both of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Navajo Dam DWC&MSW, Inc. public water treatment plant in the Community of Navajo Dam, San Juan County, New Mexico. The permit is classified as a minor industrial discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030953 which regulates emergency discharge of "backwash and flush water" to outfall 001 to the San Juan River from Cañon Largo (also spelled Canyon Largo depending upon source) to Navajo Dam for Navajo Reservoir in Segment 20.6.4.405 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC*). This segment of the San Juan River includes the designated uses of high quality coldwater aquatic life, irrigation, livestock watering, wildlife habitat, public water supply, industrial water supply and primary contact.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspector, and records and reports kept by the Permittee and/or NMED.

The inspectors arrived at the water treatment plant at approximately 1120 hours on the day of this inspection. No water treatment plant staff were on site. After contacting Candice (Cindy) Gehring, Secretary, Navajo Dam DWC&MSW, Inc., Ms. Shea made introductions, presented credentials and explained the purpose of the inspection upon her arrival. The inspectors, Ms. Gehring and Cindy Huntsman, Water Level 4 Operator, Navajo Dam DWC&MSW, Inc. toured the plant. After the tour, an exit interview to discuss preliminary findings was conducted with Ms. Gehring and Ms. Huntsman on site. The inspectors left the facility at approximately 1350 hours on the day of this inspection.

Treatment Scheme

Navajo Dam's public water and sewage nonprofit is listed as Navajo Dam Domestic Water Consumers and Mutual Sewage Works Cooperative, Inc., with certificate of incorporation filed September 29, 1980, according to the New Mexico Secretary of State Corporation Division on-line corporation query. The nonprofit corporation does business as Navajo Dam DWC&MSW, Inc. and Navajo Dam Water Consumers Association.

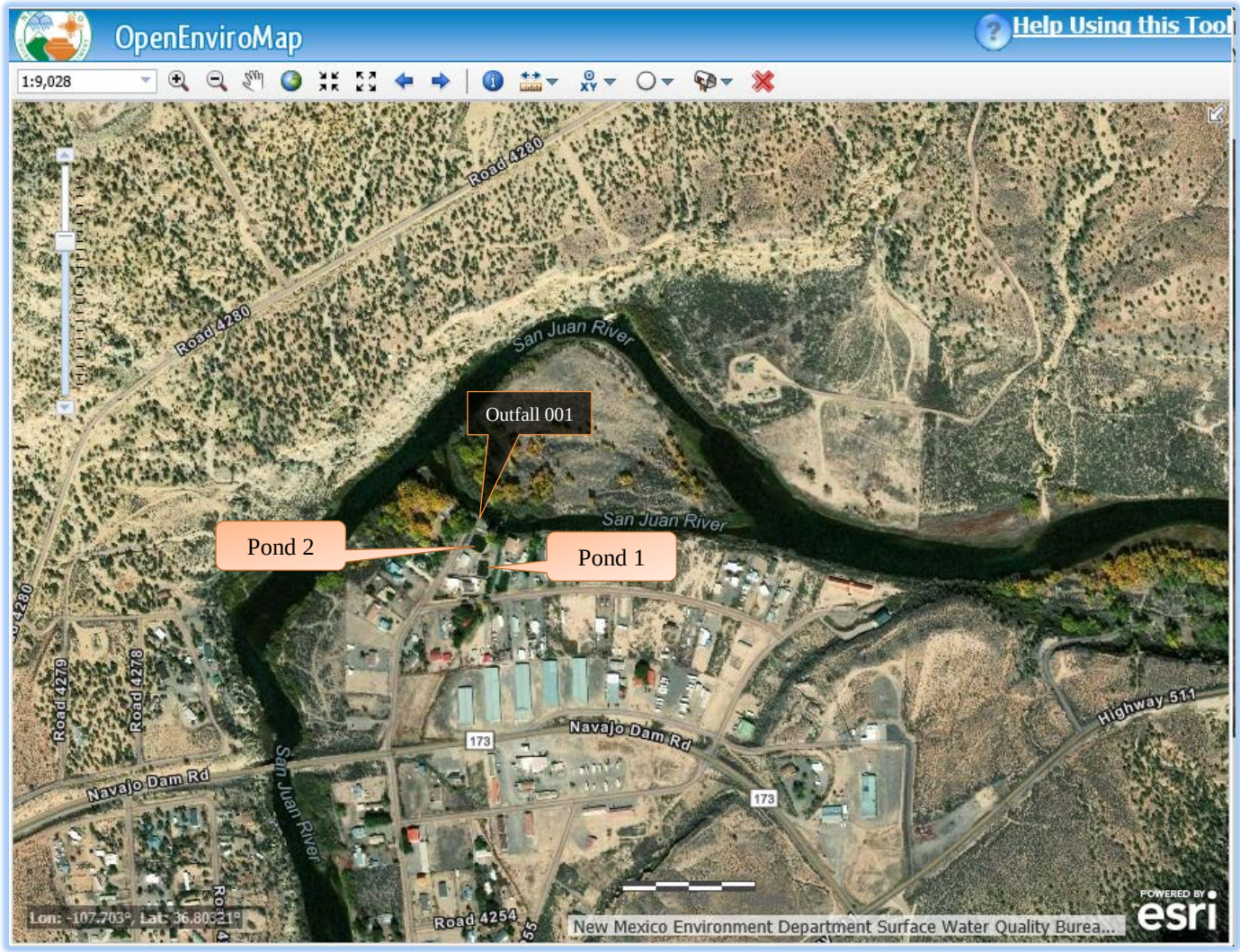
The public drinking water system serves a population of 538 according to NMED Drinking Water Bureau web site. The plant was upgraded with holding ponds installed in 2006. Upgrades to the water treatment plant went on line on April 17, 2013. The facility includes a Supervisory Control and Data Acquisition (SCADA) control system and designed to treat 100,000 gallons of raw water per day.

Raw water from a San Juan River infiltration gallery enters an intake wet well. From the wet well, raw water is pumped into two separate pressure filter systems for treatment. Water is reused in the treatment process. Coagulants (liquid polymer and alum mix) or Potassium Permanganate to reduce trihalomethanes is added to the water. Water enters a flocculation tank with variable speed paddle mixer, then settling tank with tube settlers.

Water then flows through one of two 150-micron self-cleaning filters installed in parallel. Additional chemical cleaning and water treatment chemicals (e.g., Sodium Hypochlorite) may be fed into the water treatment system. The system was designed to include caustic soda treatment, but the feed is no longer needed according to Permittee representatives. Chlorine is added for disinfection prior to distribution.

Backwash (filter to waste) and rinse water is pumped to a 90,000-gallon earthen bermed backwash pond (pond 1) with double High Density Polyethylene Fabrication (HDPF) liners. Overflow from the backwash pond flows to a 200,000-gallon earthern-berm settling pond (pond 2) with HDPE liners. A floor drain near the flocculation and settling tank inside the treatment plant is connected to a pipe that enters the backwash pond. Flow from the turbidity testing is piped to the floor drain. An overflow line (pipe) was installed at the top of the settling pond with an outfall on the southern channel of the San Juan River (see Figure 1: Vicinity Map). the cap of the overflow line pipe would need to be removed to allow a discharge at the outfall. Flow would need to be pumped into the pipe or if levels high enough then flows would be by gravity flow to the river. If discharge were to occur, the following flows were estimated on the Navajo Dam DWC&MSW, Inc. 2012 application: maximum daily flow of 4,000 gallons and average daily flow of 3,600 gallons (i.e., 0.004 and 0.0036 million gallons per day (MGD), respectively).

Figure 1: Location Map



Section A - Permit Verification – Overall Rating of "U = Unsatisfactory"

Permit Requirements for Permit Verification

Part III.A.4 (Standard Conditions, Duty to Reapply) of the permit states:

> *If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments.*

Findings for Permit Verification

- The Permittee has **not** submitted a renewal application for this no discharge / emergency permit 180 days prior to permit expiration. Permit expires October 31, 2019. Permittee representatives indicated that termination of the permit was under consideration. Contact information was provided to the Permittee representatives to report intention to submit renewal application or terminate the permit. The outfall pipe is capped, but this would not prevent a discharge if the ponds overflowed or emergency were to occur.

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of "M = Marginal"

Permit Requirements for Recordkeeping and Reporting

Part I.C (Monitoring and Reporting) of the Permit requires Discharge Monitoring Report forms to be submitted quarterly.

Findings for Recordkeeping and Reporting

- USEPA electronic database reports indicate that EPA has not received monthly DMRs for January thru June 2016. NMED SWQB files are incomplete for this time period. Paper DMRs for 2016 1st Qtr were received May 6, 2016 at NMED SWQB; but, DMRs for 2016 2nd Qtr received August 11, 2016 did not include April 2016. Permittee representatives can contact NetDMR staff if there are any questions on submitting / re-submitting reports for the 1st and 2nd Quarter of 2016.

Section C - Operations and Maintenance – Overall Rating of "M = Marginal"

Permit Requirements for Operations and Maintenance

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit states:

> *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit…. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

Part III.B.6 (Standard Conditions, Removed Substances) of the permit states:

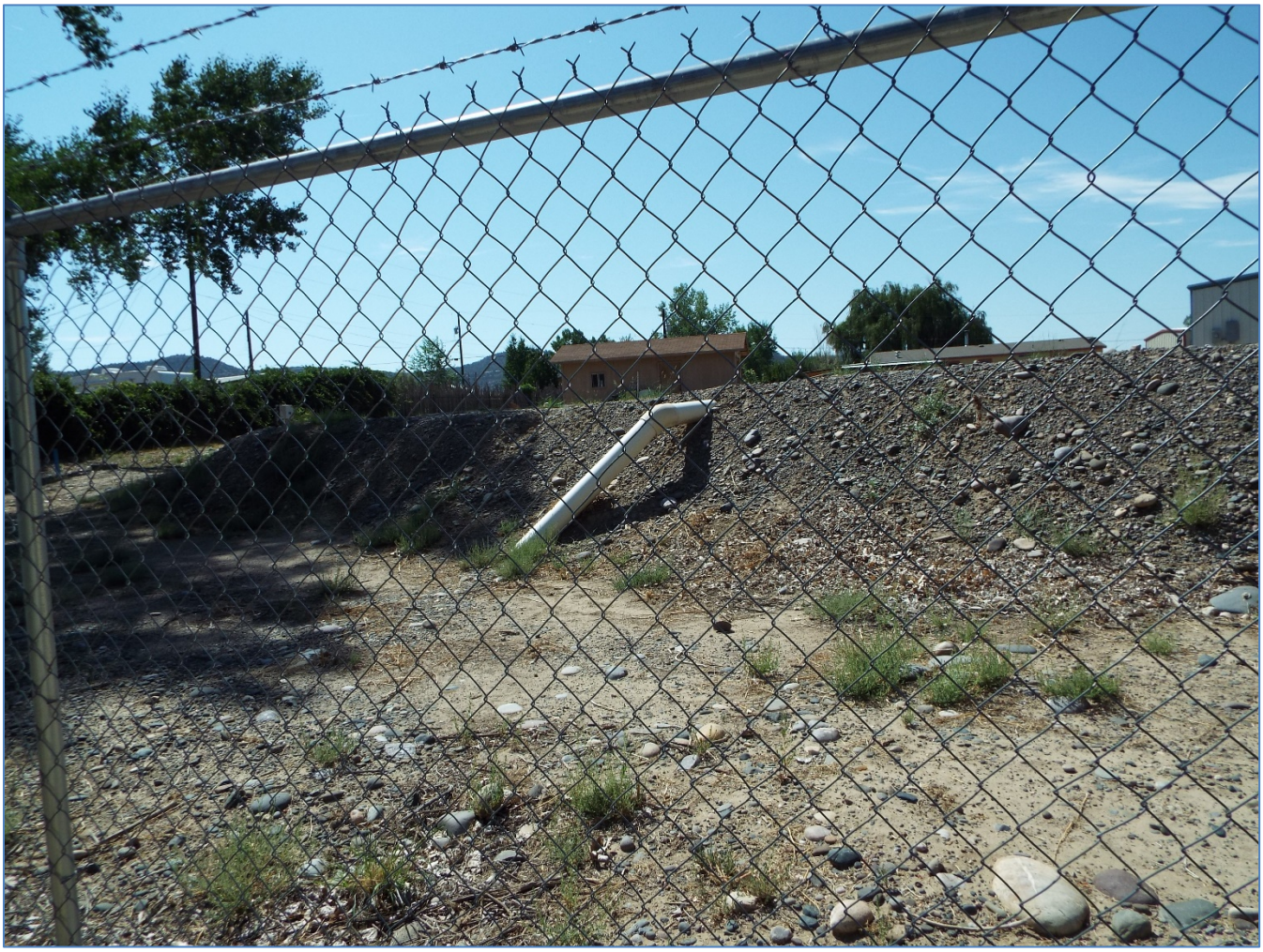
> *Unless otherwise authorized, solids, sewage sludges, filter backwash, or other pollutants removed in the course of treatment or wastewater control shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.*

Findings for Operation and Maintenance

- On the day of this inspection, settled and floating solids were observed at both ponds. According to the on-site representatives, ponds were previously drained and cleaned out in 2014; backwash pond had a leak between the liners; and solids from the backwash pond would be removed when the liner is repaired. Details for disposal or reuse of water in upland areas had not been determined. The date for maintenance had not be scheduled.

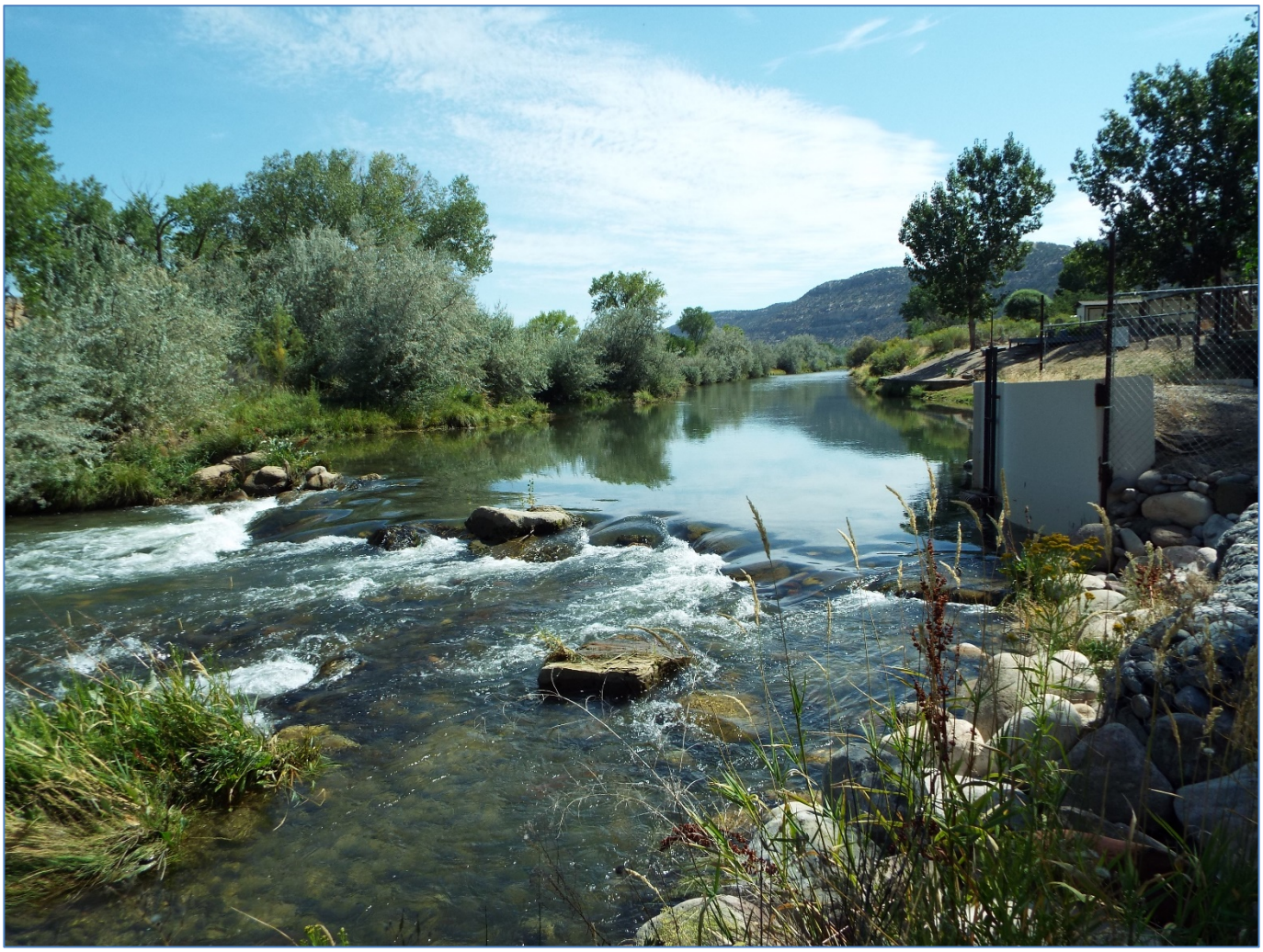
NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: 09/05/2019	Time: 1132 hours
City/County: Community of Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Discharge pipe outside the settling pond (Pond 2). Vegetation along the bank of San Juan River southern channel was heavy and the outfall could not be seen.		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: 09/05/2019	Time: 1133 hours
City/County: Community of Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Looking upstream from WTP infiltration gallery / diversion at San Juan River southern channel.		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: 09/05/2019	Time: 1249 hours
City/County: Community of Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Vegetation was growing inside the backwash evaporation pond (Pond #1). Settled solids and floating algal mats was observed.		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: 09/05/2019	Time: 1250 hours
City/County: Community of Navajo Dam / San Juan County		State: New Mexico
Location: Navajo Dam DWC&MSW, Inc. Water Treatment Plant, NM0030953		
Subject: Settling Evaporation Pond (Pond #2). Arrow points to capped outlet of a pipe installed within the pond liner and berm shown in Photo #1 above.		

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